

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA  
THIRD DIVISION**

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In Re:

Bankruptcy No. 22-31881  
Chapter 7 Case

Matthew Fred Whebbe,

Debtor.

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**APPLICATION FOR APPROVAL OF EMPLOYMENT OF ATTORNEY**

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TO THE COURT:

1. Applicant is the trustee in this case.
2. Applicant believes that the employment of an Attorney is necessary to represent or assist trustee in carrying out the trustee's duties as follows:

To review the debtor's ownership interest in various entities and their assets; to extricate property of the estate from a state court receivership; to handle potential real estate sales, to investigate and recover potential fraudulent conveyances and preferences, to investigate the estate's claims under insurance policies, and to perform any and all other legal services necessary for the administration of the estate.

3. Buckley & Jensen, 1257 Gun Club Road, White Bear Lake, Minnesota 55110, are qualified by reason of practice and experience to render such representation or assistance.
4. The compensation will be as follows: \$500.00 per hour. Buckley & Jensen has agreed to perform services as counsel on an hourly fee plus costs basis. Fees and costs shall be subject to court review and approval. However, Buckley & Jensen may reimburse itself for out-of-pocket expenses in serving creditors and parties in interest with various pleadings and notices, and paying litigation costs such as filing fees and court reporting fees without prior court approval. The payment of the out-of-pocket expenses will be subject to final court approval and disgorgement in the fee application process.
5. Said professional has disclosed to the undersigned that they have no other connections with the Debtor(s), creditors any other party-in-interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee:

None.

6. The attorney has made no agreement with the debtor or any other person for the division of any fees which may be allowed pursuant to this application prohibited by 11 U.S.C. Section 504, other than with members of attorney's law firm.
7. The trustee has made the following efforts to recover the asset prior to submitting this application:

NA

8. I, Mary Jo A. Jensen-Carter of Buckley & Jensen, the proposed professional named in the foregoing report, declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information and belief.

WHEREFORE, applicant prays that the Court approve such employment by the trustee.

Date: November 22, 2022

/e/ Mary Jo A. Jensen-Carter  
Mary Jo A. Jensen-Carter, Trustee

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**VERIFIED STATEMENT OF  
PROPOSED ATTORNEY**

Mary Jo A. Jensen-Carter of Buckley & Jensen submits the following verified statement in connection with the proposed employment as attorneys for the trustee in the above captioned matter as follows:

1. She and/or members of her law firm have the following connections with the following parties (all answers are NONE unless otherwise indicated):
  - a. The debtor: \_\_\_\_\_
  - b. Creditors: \_\_\_\_\_
  - c. Any other party in interest, their respective attorneys and accountants \_\_\_\_\_
  - d. The United States Trustee or any person employed in the office of the United States Trustee: Mary Jo A. Jensen-Carter is a member of the Chapter 7 Panel of Trustees maintained by the U.S. Trustee pursuant to 28 U.S.C. Section 556(a) and is the trustee in the captioned case.
2. That no member of applicant's law firm is a creditor, equity security holder, or insider of the debtor; is not and was not an investment banker for any outstanding security of theirs; is not and has not been within three years before the date of the filing of the petition an investment banker for security of the debtor or any attorney for such an investment banker in connection

with the offer, sale or issuance of the security of the debtor; is not and was not within two years prior to the date of the filing of the petition, a director, officer, or employee of the debtor or of an investment banker specified above; and does not have an interest materially adverse to the interest of the estate or any class of creditor or equity security holders by reason of any direct or indirect relationship to or connection with or interest in the debtor or an investment banker specified above or for any other reason.

3. That there are no agreements with the debtor or any other person for the division of any fees which may be allowed pursuant to this Application which division is prohibited by 11 U.S.C. Section 504.

I, Mary Jo A. Jensen-Carter of Buckley & Jensen declare under penalty of perjury that I have read the foregoing Verified Statement of Proposed Attorney and that it is true and correct to the best of my knowledge, information and belief.

Dated: November 22, 2022

/e/ Mary Jo A. Jensen-Carter  
Mary Jo A. Jensen-Carter, #186041  
Buckley & Jensen  
1257 Gun Club Road  
White Bear Lake, MN 55110  
(651) 486-7475

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**UNSWORN CERTIFICATE OF SERVICE**

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I, Cassandra Jo Warner, declare under penalty of perjury that on November 22, 2022, I served copies of the attached **Application for Approval of Employment of Attorney, Verified Statement of Proposed Attorney and proposed Order** upon the following individuals by e-mail:

Office of the U.S. Trustee

email: [USTPRegion12.MN.ECF@usdoj.gov](mailto:USTPRegion12.MN.ECF@usdoj.gov)

Date: November 22, 2022

Signed: /e/ Cassandra Jo Warner

Cassandra Jo Warner

Buckley & Jensen

1257 Gun Club Road

White Bear Lake, MN 55110

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**ORDER APPROVING EMPLOYMENT OF ATTORNEY**

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The trustee's application to approve the employment of Buckley & Jensen as the trustee's attorneys came before the court.

Based on the application, the recommendation of the United States Trustee and 11 U.S.C. § 327,

IT IS ORDERED: the employment is approved.

Dated:

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Katherine A. Constantine  
United States Bankruptcy Judge